

REMARKS

This is in response to the Office Action mailed on March 28, 2007. Claims 1-28 were pending in the application, and the Examiner rejected all of the claims. With the present response, claims 1, 14, 22, and 27 are amended, claims 3-10, 12, 16-21, 23, 25, and 28 are cancelled, claims 29-34 are new, and the remaining claims are unchanged. Consideration and allowance of all pending claims are respectfully solicited in light of the following comments.

Claim 1:

Claim 1 has been amended to include the limitation previously presented in its dependent claim 7. On page 2 of the Office Action, the Examiner rejected both claims 1 and 7 under 35 U.S.C. §102 as being anticipated by Takeda et al. U.S. Pat. No. 5,826,220 (hereinafter "Takeda"). Applicant respectfully contends that amended claim 1 is patentable over Takeda because the limitation previously presented in claim 7, and now included in claim 1, is not anticipated or obvious in light of the cited reference.

On page 4 of the Office Action, the Examiner states that Takeda column 9 lines 3-10 discloses the former claim 7 limitation of providing update information to be assimilated into a database of corresponding logical forms associated with the automatic machine translation system. Applicant respectfully contends that Takeda does not disclose this.

Takeda column 9 lines 3-10 states that the Takeda database consists of only the original word, a top candidate translation word, and a learned translation word. Takeda clearly does not disclose a database of corresponding logical forms. As discussed starting on page 25 of the Applicant's specification and also discussed in U.S. Pat. No. 5,966,686 incorporated by reference, logical forms are data structures that describe labeled dependencies among content words in the textual input. Logical

forms can normalize certain syntactical alternations and also resolve both intrasentential anaphora and long distance dependencies. A database of logical forms is thus much different than the simple database of three components disclosed in Takeda.

As well as not being anticipated by Takeda, claim 1 is also not obvious by Takeda. The system in Takeda only provides enough information to update a database consisting of the original word, a top candidate word, and a learned word. The system does not contain enough information to be useful to a database of logical forms. A person of ordinary skill in the art would not be motivated to modify the Takeda system to assimilate update information into a database of logical forms, because the information would be useless to a logical forms database and would not improve the translation capability of the system.

For at least the reasons listed above, applicant respectfully contends that amended claim 1 is not anticipated or obvious, and respectfully submits claim 1 for consideration and allowance.

Claim 2:

Applicant respectfully contends that claim 2 is patentable based on its dependence upon the patentable independent claim 1. Consideration and allowance of claim 2 are respectfully solicited.

Claim 11:

On page 11 of the Office Action, the Examiner rejected claim 11 under 35 U.S.C. §103 as being unpatentable over Takeda in view of Cheng et al. U.S. Pat. No. 7,110,938 (hereinafter "Cheng"). Applicant respectfully contends that claim 11 is not anticipated or obvious by the cited references considered individually or in combination.

Claim 11 is dependent on claim 1 and includes the claim 1 limitation of providing update information to be assimilated into the automatic translation system of claim 1. In addition to the claim 1 limitation, claim 11 goes on to recite the limitation of

transmitting update information across a network to be assimilated into a knowledge source associated with a different automatic machine translation system. Speaking very generally, claim 11 is providing update information to be included in two different translation systems. Both Takeda (Takeda fig. 10 "5e") and Cheng (Cheng fig. 2 "20") each only disclose providing update information to one translation system.

On page 12 of the Office Action, the Examiner states that it would have been obvious to modify Takeda (presumably in light of Cheng) to transmit update information into a knowledge source associated with a different automatic machine translation system, because this would allow multiple customers to utilize the updated information. Applicant respectfully disagrees with this assertion. Takeda column 5 lines 5-13 teaches that "multiple customers" benefit from the maintenance of the one database "20" by reducing redundant translations, reducing overhead, and improving robustness. A person of ordinary skill would not be motivated to modify the Takeda system to match claim 11 because Takeda teaches away from doing so.

Applicant respectfully contends that claim 11 is not anticipated or obvious by Takeda or Cheng, and respectfully submits claim 11 for consideration and allowance.

Claim 13:

Applicant respectfully contends that claim 13 is patentable based on its dependence upon the patentable independent claim 1. Consideration and allowance of claim 13 are respectfully solicited.

Claim 14:

Claim 14 has been amended to include a limitation similar to the limitation previously presented in claim 22. On page 2 of the Office Action, the Examiner rejected claim 14 under 35 U.S.C. §102 as being unpatentable by Takeda, and on page 10 of the Office

Action, the Examiner rejected claim 22 under 35 U.S.C. §103 as being unpatentable over Takeda in view of Kuno et al. U.S. Pat. No. 5,528,491 (hereinafter "Kuno"). Applicant respectfully contends that claim 14 is patentable at least because the former claim 22 limitation, now included in amended claim 14, is not anticipated or obvious in view of the cited references considered independently or in combination.

On page 10 of the Office Action, the Examiner states that Kuno (column 3 lines 53-55 and column 10 lines 1-9) discloses the amended claim 14 limitation of providing information to be assimilated into a collection of parsing information associated with the automatic machine translation system. Applicant respectfully contends that Kuno does not disclose this.

The cited sections of Kuno describe a process in which a user has the ability to either manually correct a translation given by the parser, or to limit the text considered by the parser and request a new translation based on the more limited amount of text. This is different than the method recited in claim 14. Very generally speaking, the method of claim 14 allows the parsing system to be updated to reduce the likelihood that the error will be repeated in the future. The parsing system in Kuno can not be updated. It will repeatedly give the same translation regardless of the number of previous corrections.

Applicant respectfully contends that claim 14 is not anticipated or obvious, and respectfully submits claim 14 for consideration and allowance.

Claims 15 and 22:

Applicant respectfully contends that claims 15 and 22 are patentable based on their dependence upon the patentable independent claim 14. Consideration and allowance of claims 15 and 22 are respectfully solicited.

Claim 24:

On page 11 of the Office Action, the Examiner rejected claim 24 under 35 U.S.C. §103 for the same reasons as why the Examiner rejected claim 11. Applicant respectfully contends that claim 24 is patentable at least for the reasons discussed under the claim 11 argument. Applicant respectfully submits claim 24 for consideration and allowance.

Claim 26:

Applicant respectfully contends that claim 26 is patentable based on its dependence upon the patentable independent claim 14. Consideration and allowance of claim 26 are respectfully solicited.

Claim 27:

Claim 27 has been amended to include the limitation previously presented in its dependent claim 28. On page 11 of the Office Action, the Examiner rejected claim 28 under 35 U.S.C. §103 for the same reasons as why the Examiner rejected claim 11. Applicant respectfully contends that amended claim 27 is patentable at least for the reasons discussed under the claim 11 argument. Applicant respectfully submits claim 27 for consideration and allowance.

Claim 29:

Claim 29 is a new claim dependent on claim 27. The limitation recited in claim 29 was previously recited in the now cancelled claim 10. On page 2 of the Office Action, the Examiner rejected claim 10 under 35 U.S.C. §102 as being unpatentable by Takeda. Applicant respectfully contends that claim 29 is patentable at least because the former claim 10 limitation, now the claim 29 limitation, is not anticipated or obvious by Takeda.

On page 4 of the Office Action, the Examiner states that Takeda column 11 lines 10-20 discloses providing update information to be assimilated into a collection of groups of corresponding words or phrases associated with the automatic

translation system. Applicant respectfully contends that Takeda does not disclose this.

Takeda column 11 lines 10-20 and the associated figures only disclose updating one group of words. It does not disclose updating multiple groups of words or phrases.

Additionally, it would not be obvious to modify Takeda to update multiple groups of words or phrases. As described in Takeda column 11 lines 59-67, the Takeda system only looks to one entry group to translate a learned word. It would not be obvious to update multiple groups of words or phrases in Takeda, because the additional groups of words or phrases would not be used in future translations. It would be a waste of resources to update multiple groups of words or phrases in Takeda.

For at least the reasons listed above, applicant respectfully contends that claim 29 is patentable, and respectfully submits claim 29 for consideration and allowance.

Claims 30-34:

Claims 30-34 are new. All of the claims are well supported by the applicant's specification and figures as originally filed. For example, the claim 30 limitation of receiving at least one correction instruction from a human translator is disclosed on page 15 of the specification; the claim 31 limitation of referencing confidence metric information is disclosed on page 18 of the specification; and the claim 32 limitation of a manual translation evaluation is disclosed on page 20 of the specification.

Applicant respectfully contends that each of these claims is patentable over the cited references considered independently or in combination. For example, the confidence metric information limitation of claim 31 is not disclosed in any of the references, nor would it be obvious to modify any of the references to include confidence metric information.

Applicant respectfully submits new claims 30-34 for consideration and allowance.

Conclusion:

It is respectfully submitted that claims 1, 11, 14, 24, 27, and 29-34 are patentably distinguishable from the cited references considered independently or in combination. It is also respectfully submitted that claims 2, 13, 15, 22, and 26 are patentable based on their dependence upon patentable independent claims. Accordingly, consideration and allowance of all pending claims are respectfully solicited.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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By: \_\_\_\_\_



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